

YUO-FONG "BENNI" C. AMATO  
(619) 204-3746  
BAMATO@GORDONREES.COM

FILED

AUG - 8 2017

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GORDON & REES  
SCULLY MANSUKHANI

ATTORNEYS AT LAW  
275 BATTERY STREET, SUITE 2000  
SAN FRANCISCO, CA 94111  
PHONE: (415) 986-5900  
FAX: (415) 986-8054  
WWW.GORDONREES.COM

August 7, 2017

DMR

**BY HAND-DELIVERY**

CV 17 80 101 MISC

Office of the Clerk  
U.S. District Court for the Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102-3489

**Re: Application for DMCA Subpoena**

Dear Sir or Madam:

This law office represents Urban One, Inc. ("Urban One"), previously known as Radio One, Inc. On behalf of Urban One, I respectfully request that the Clerk issue a subpoena pursuant to 17 U.S.C. § 512(h).

By way of background, Section 512(h) of the Digital Millennium Copyright Act provides that a "copyright owner or a person authorized to act on the owner's behalf may request the clerk of any United States District Court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with this subsection." 17 U.S.C. § 512(h)(1). For a subpoena to be issued, Section 512 (h) requires that a copyright owner file the following with the Clerk:

- (1) A copy of the notifications required by Section 512(c)(3)(A);
- (2) A proposed subpoena; and
- (3) A sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under this title.

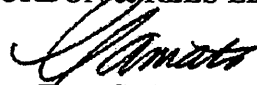
Accordingly, enclosed for filing with the Clerk are Urban One's notifications pursuant to Section 512(c)(3)(A), a proposed subpoena, and a sworn declaration. As Urban One has complied with the requirements of the statute, it asks that the Clerk pursuant to Section 512(h)(4) expeditiously issue and sign the proposed subpoena and return it to Urban One (c/o undersigned counsel) for service on the subpoena recipient.

Office of the Clerk  
August 7, 2017  
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Thank you for your cooperation and prompt response in this matter. If you have any questions, I am reachable as noted above.

Yours truly,

GORDON & REES LLP

A handwritten signature in black ink, appearing to read 'Y. Amato', written over the firm name.

Yuo-Fong C. Amato

Enclosures.

**From:** Taylor Major <tmajor@urban1.com>  
**Sent:** Monday, May 01, 2017 1:54 PM  
**To:** YouTube (copyright@youtube.com)  
**Subject:** Copyright Complaint  
**Attachments:** YouTube Takedown Request - Coobtrax Infringing Links.docx

Hello,

I am writing to submit a copyright complaint against an account that has used audio from The Rickey Smiley Morning Show, a nationally syndicated radio morning show, in more than 2,000 of its videos. The content is owned by Reach Media, Inc., a subsidiary of Radio One, Inc., and the account holder did not obtain permission from either entity to use content from the show. The links to the infringing videos are in the attached document.

Account Holder: Coobtrax

Contact information: [tmajor@radio-one.com](mailto:tmajor@radio-one.com)

I agree to the following statements:

1. "I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law."
2. "The information in this notification is accurate, and under penalty of perjury, I am the owner, or an agent authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed."

Thank you,

Taylor Major

**Taylor Major**  
Staff Attorney  
Radio One, Inc.  
8809 Lenox Pointe Drive, Suite A  
Charlotte, NC 28273  
704-968-0352 | [tmajor@radio-one.com](mailto:tmajor@radio-one.com)

The videos in the following links impermissibly use audio from the Rickey Smiley Morning Show, a nationally syndicated morning show, the rights of which belong to Reach Media, Inc.:

<https://www.youtube.com/watch?v=76vwkzHtrgo>  
<https://www.youtube.com/watch?v=65ytPyr1r3I>  
<https://www.youtube.com/watch?v=KXwOvAKT3xI>  
<https://www.youtube.com/watch?v=d8a8iWoHtoQ>  
<https://www.youtube.com/watch?v=aWxPb9iKN5s>  
<https://www.youtube.com/watch?v=T4Hp7Ll-ONc>  
<https://www.youtube.com/watch?v=2EzJ0AHsRXE>  
<https://www.youtube.com/watch?v=dW0wWCpNnUI>  
<https://www.youtube.com/watch?v=TZDieia-Ye4>  
<https://www.youtube.com/watch?v=lgxSgP4ztGI>  
[https://www.youtube.com/watch?v=9Xfr\\_8GKCrA](https://www.youtube.com/watch?v=9Xfr_8GKCrA)  
<https://www.youtube.com/watch?v=h1BrwPbYA5U>  
<https://www.youtube.com/watch?v=UwvL7kVYOtM>  
<https://www.youtube.com/watch?v=oboYGGTEI4Q>  
<https://www.youtube.com/watch?v=bHfouUI7eCE>  
<https://www.youtube.com/watch?v=GkfL3gM5G3g>  
<https://www.youtube.com/watch?v=g41cOKzyKrU>  
<https://www.youtube.com/watch?v=NVd9IqLm8GE>  
<https://www.youtube.com/watch?v=F9SPsWye--A>  
<https://www.youtube.com/watch?v=OsCkSuwm6cU>  
<https://www.youtube.com/watch?v=1pmPYfdRO-k>  
<https://www.youtube.com/watch?v=pjDLTjiE76Q>  
<https://www.youtube.com/watch?v=O5kyCMDIXxQ>  
<https://www.youtube.com/watch?v=774c9jAgf0U>  
<https://www.youtube.com/watch?v=FX8NvcCJmBE>  
<https://www.youtube.com/watch?v=QiOYWPCtLNY>  
<https://www.youtube.com/watch?v=8zTvSqlVDjc>  
[https://www.youtube.com/watch?v=7J-5\\_XA08LA](https://www.youtube.com/watch?v=7J-5_XA08LA)  
<https://www.youtube.com/watch?v=lsrsctASL6g>  
<https://www.youtube.com/watch?v=dYLCnwrLJDM>  
[https://www.youtube.com/watch?v=zJc4WgNV5\\_k](https://www.youtube.com/watch?v=zJc4WgNV5_k)  
<https://www.youtube.com/watch?v=vbGBmxH3uJo>  
<https://www.youtube.com/watch?v=lGOVTICxB5k>  
<https://www.youtube.com/watch?v=yXaDNFMsdU>  
<https://www.youtube.com/watch?v=UgiQJCOFaoc>  
<https://www.youtube.com/watch?v=JfVvuiw5wUs>  
<https://www.youtube.com/watch?v=3uE4AARk7Ng>  
<https://www.youtube.com/watch?v=ID6qDELABCA>  
[https://www.youtube.com/watch?v=54vGx\\_oywRI](https://www.youtube.com/watch?v=54vGx_oywRI)  
<https://www.youtube.com/watch?v=QhXB6DO55Cs>  
<https://www.youtube.com/watch?v=fYfM6cQgLeA>  
[https://www.youtube.com/watch?v=aoNEb6r5\\_qM](https://www.youtube.com/watch?v=aoNEb6r5_qM)

<https://www.youtube.com/watch?v=5IUvsa28IHs>  
<https://www.youtube.com/watch?v=VHRuHenv60s>  
<https://www.youtube.com/watch?v=BNBW-JTehgQ>  
[https://www.youtube.com/watch?v=uG\\_LSd2jrDw](https://www.youtube.com/watch?v=uG_LSd2jrDw)  
<https://www.youtube.com/watch?v=Nh-NMFnvwCQ>  
<https://www.youtube.com/watch?v=uU2h4hgkTYI>  
<https://www.youtube.com/watch?v=EHa2-Fbys6g>  
<https://www.youtube.com/watch?v=o5yfgT3NGHw>  
[https://www.youtube.com/watch?v=0nd\\_VY0YJY](https://www.youtube.com/watch?v=0nd_VY0YJY)  
<https://www.youtube.com/watch?v=RAbvJkNN81I>  
<https://www.youtube.com/watch?v=K0k4V6MGATU>  
<https://www.youtube.com/watch?v=rjztZ3tWHY>  
<https://www.youtube.com/watch?v=JnHwUMGQ5IQ>  
<https://www.youtube.com/watch?v=gD69bSXWS2Y>  
[https://www.youtube.com/watch?v=b4i8\\_gAPcHc](https://www.youtube.com/watch?v=b4i8_gAPcHc)  
<https://www.youtube.com/watch?v=la23yTHdCXQ>  
<https://www.youtube.com/watch?v=kP73DJqfRq4>  
<https://www.youtube.com/watch?v=w1CZ30xKYTY>  
<https://www.youtube.com/watch?v=WKEcbKdXdnY>  
<https://www.youtube.com/watch?v=Aq2TlJI6Anc>  
<https://www.youtube.com/watch?v=rDcjQUtcl>  
<https://www.youtube.com/watch?v=VPGWxh0IyEk>  
<https://www.youtube.com/watch?v=4htPI0TlCrg>  
<https://www.youtube.com/watch?v=Hox02csoQaQ>  
<https://www.youtube.com/watch?v=2Wd2CNphLfA>  
<https://www.youtube.com/watch?v=3QLMdL5RZWw>  
[https://www.youtube.com/watch?v=GRgpHTd\\_jsg](https://www.youtube.com/watch?v=GRgpHTd_jsg)  
<https://www.youtube.com/watch?v=5kPYzgF5ows>  
<https://www.youtube.com/watch?v=0i9KuQDrCg>  
<https://www.youtube.com/watch?v=6lBqLn7Z9qY>  
<https://www.youtube.com/watch?v=oeoUwMcoDiw>  
[https://www.youtube.com/watch?v=bU\\_RniJUF7s](https://www.youtube.com/watch?v=bU_RniJUF7s)  
<https://www.youtube.com/watch?v=qjqN8Vm5UTc>  
<https://www.youtube.com/watch?v=iGOLWWcKS4k>  
<https://www.youtube.com/watch?v=Yeiyyx59SYM>  
<https://www.youtube.com/watch?v=0wsMAr-FLLs>  
<https://www.youtube.com/watch?v=PMO-EmGtSzU>  
<https://www.youtube.com/watch?v=2HZhtNqK84w>  
<https://www.youtube.com/watch?v=CHfQ8pggLGo>  
<https://www.youtube.com/watch?v=ZUpSwaupfCI>

[https://www.youtube.com/watch?v=uoQD7n3\\_uGc](https://www.youtube.com/watch?v=uoQD7n3_uGc)  
<https://www.youtube.com/watch?v=5WS7njc9jmo>  
<https://www.youtube.com/watch?v=vIMmNSLvDb0>  
<https://www.youtube.com/watch?v=kFZLfZtxXWM>  
<https://www.youtube.com/watch?v=ltNNhufZ5X0>  
<https://www.youtube.com/watch?v=wuREaaqwbfo>  
<https://www.youtube.com/watch?v=fnNN7tAzIBY>  
<https://www.youtube.com/watch?v=wGBK-ILUYyg>  
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<https://www.youtube.com/watch?v=zpWmOdOawI>  
<https://www.youtube.com/watch?v=Rn7d7q0lnTI>  
<https://www.youtube.com/watch?v=giRBg0AQSGo>  
<https://www.youtube.com/watch?v=nznAMiGZCIo>  
<https://www.youtube.com/watch?v=X4HCakO0JxM>  
<https://www.youtube.com/watch?v=IbAhQcgl9AA>  
<https://www.youtube.com/watch?v=NkU2pYAhoEo>  
<https://www.youtube.com/watch?v=AcmH896Rs2Q>  
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<https://www.youtube.com/watch?v=OeqPp5V8irU>  
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<https://www.youtube.com/watch?v=fYyI2tk-i2U>  
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<https://www.youtube.com/watch?v=xVGQaY2gvLg>  
<https://www.youtube.com/watch?v=ic-riWYwwlo>  
<https://www.youtube.com/watch?v=RJi-GHPJa60>  
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<https://www.youtube.com/watch?v=oRdLEM3rRc4&t=1s>  
<https://www.youtube.com/watch?v=NUeZsoS6URg>



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<https://www.youtube.com/watch?v=G4-OhJnb4l4>  
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<https://www.youtube.com/watch?v=F1NG5D2y5jc>  
<https://www.youtube.com/watch?v=GCi-YCrDSXs>  
<https://www.youtube.com/watch?v=R9aknrB4phM>  
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<https://www.youtube.com/watch?v=CWv0EsFvxgo>  
<https://www.youtube.com/watch?v=P-wsjz5VHOs>  
<https://www.youtube.com/watch?v=v334KLoRNfQ>



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<https://www.youtube.com/watch?v=tT3KI9db8B8>  
<https://www.youtube.com/watch?v=bMd-E8N7R18>  
<https://www.youtube.com/watch?v=C0q1XkGx7xM>  
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<https://www.youtube.com/watch?v=habR8ch8-pk>  
<https://www.youtube.com/watch?v=f6vxfzpCi94>  
<https://www.youtube.com/watch?v=vzTbdya8Crk>  
<https://www.youtube.com/watch?v=B-cjXyvy3Q4>  
<https://www.youtube.com/watch?v=Xsc-stnWxwU>  
<https://www.youtube.com/watch?v=fBQ8UdotlVs>  
<https://www.youtube.com/watch?v=B1R8R3pXKy4>  
[https://www.youtube.com/watch?v=nYsssS8U\\_Jo](https://www.youtube.com/watch?v=nYsssS8U_Jo)  
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[https://www.youtube.com/watch?v=U\\_L3c8sr3Kw](https://www.youtube.com/watch?v=U_L3c8sr3Kw)  
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<https://www.youtube.com/watch?v=aC65I1XL8V0>



<https://www.youtube.com/watch?v=wfi7gyy8nDg>  
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<https://www.youtube.com/watch?v=rdlecaEtMzo>  
<https://www.youtube.com/watch?v=4nGZzIzZPCQ>  
<https://www.youtube.com/watch?v=qFQHLLAvSyk>  
<https://www.youtube.com/watch?v=YOsngL7ooK0>  
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[https://www.youtube.com/watch?v=Qf\\_uCvGWQ08](https://www.youtube.com/watch?v=Qf_uCvGWQ08)  
[https://www.youtube.com/watch?v=nDGe\\_4s4wHw](https://www.youtube.com/watch?v=nDGe_4s4wHw)  
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<https://www.youtube.com/watch?v=XkabNFZhJJ4>  
<https://www.youtube.com/watch?v=xFXd9vQ3AR8>  
<https://www.youtube.com/watch?v=v8XTZQoyuIs>  
<https://www.youtube.com/watch?v=i2Pq0kKP5G0>  
[https://www.youtube.com/watch?v=4a5IGEWd\\_kI](https://www.youtube.com/watch?v=4a5IGEWd_kI)  
<https://www.youtube.com/watch?v=90qYVW4wocc>  
<https://www.youtube.com/watch?v=cmLohFtE51k>  
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<https://www.youtube.com/watch?v=rISJIyrWERS>  
<https://www.youtube.com/watch?v=zMOHURS8saw>  
[https://www.youtube.com/watch?v=Cz8TXyo5l\\_Q](https://www.youtube.com/watch?v=Cz8TXyo5l_Q)  
<https://www.youtube.com/watch?v=NJtzvpocTH4>  
<https://www.youtube.com/watch?v=PVCsu88pqIM>  
<https://www.youtube.com/watch?v=9-QpXiB9hDE>  
<https://www.youtube.com/watch?v=h1qth9UV6Qc>

<https://www.youtube.com/watch?v=6lQdo34Jkj0>

<https://www.youtube.com/watch?v=V7aVYGd0Yso>

**From:** Taylor Major <tmajor@urban1.com>  
**Sent:** Tuesday, May 02, 2017 2:02 PM  
**To:** YouTube (copyright@youtube.com)  
**Subject:** Copyright Complaint  
**Attachments:** YouTube Takedown Request - Coobtrax Infringing Links 2.docx

Hello,

I am writing to submit a copyright complaint against an account that has used audio from The Rickey Smiley Morning Show, a nationally syndicated radio morning show, in more than 2,000 of its videos. The content is owned by Reach Media, Inc., a subsidiary of Radio One, Inc., and the account holder did not obtain permission from either entity to use content from the show. The links to the infringing videos are in the attached document.

Account Holder: Coobtrax

Contact information: [tmajor@radio-one.com](mailto:tmajor@radio-one.com)

I agree to the following statements:

1. "I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law."
2. "The information in this notification is accurate, and under penalty of perjury, I am the owner, or an agent authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed."

Thank you,

Taylor Major

**Taylor Major**  
Staff Attorney  
Radio One, Inc.  
8809 Lenox Pointe Drive, Suite A  
Charlotte, NC 28273  
704-968-0352 | [tmajor@radio-one.com](mailto:tmajor@radio-one.com)

The videos in the following links impermissibly use audio from the Rickey Smiley Morning Show, a nationally syndicated morning show, the rights of which belong to Reach Media, Inc.:

<https://www.youtube.com/watch?v=9GvGmdq40es>  
<https://www.youtube.com/watch?v=MU8hFvaQZn0>  
<https://www.youtube.com/watch?v=tFSCwGhStQ>  
<https://www.youtube.com/watch?v=TmfQkHaKKBo>  
<https://www.youtube.com/watch?v=0JZ4untQcno>  
<https://www.youtube.com/watch?v=UizJEi4pf1k>  
[https://www.youtube.com/watch?v=pl\\_uimRI-V8](https://www.youtube.com/watch?v=pl_uimRI-V8)  
<https://www.youtube.com/watch?v=aQlvCMMnKQM>  
[https://www.youtube.com/watch?v=t\\_43GJyclqo](https://www.youtube.com/watch?v=t_43GJyclqo)  
[https://www.youtube.com/watch?v=pDMR9i\\_g5BA](https://www.youtube.com/watch?v=pDMR9i_g5BA)  
<https://www.youtube.com/watch?v=bpITLlt6WuQ>  
<https://www.youtube.com/watch?v=JhWXf4sb-H8>  
<https://www.youtube.com/watch?v=EprWNRQtQTW>  
<https://www.youtube.com/watch?v=KwyfmEgTlcY>  
<https://www.youtube.com/watch?v=VaeT3Yeppzc>  
<https://www.youtube.com/watch?v=k7unSjWYasA>  
<https://www.youtube.com/watch?v=rZtNpfQ2JM8>  
<https://www.youtube.com/watch?v=P-uLKvMBTqA>  
[https://www.youtube.com/watch?v=0x6o\\_0efXb0](https://www.youtube.com/watch?v=0x6o_0efXb0)  
<https://www.youtube.com/watch?v=Zlq5UOIIdAU>  
<https://www.youtube.com/watch?v=mnDzodX5awc>  
<https://www.youtube.com/watch?v=kor7vWJ6gbA>  
[https://www.youtube.com/watch?v=u-pog2\\_qb6w](https://www.youtube.com/watch?v=u-pog2_qb6w)  
<https://www.youtube.com/watch?v=eu-mj5bTABw>  
<https://www.youtube.com/watch?v=QpN1amIM2lg>  
<https://www.youtube.com/watch?v=jsm5uGB446c>  
<https://www.youtube.com/watch?v=kh7mUCutRhc>  
<https://www.youtube.com/watch?v=vOn0nSQcUPA>  
<https://www.youtube.com/watch?v=OXF9xbKiMV0>  
<https://www.youtube.com/watch?v=SiFgvScLcTg>  
<https://www.youtube.com/watch?v=NNWip1sKZYy>  
<https://www.youtube.com/watch?v=wAJAijMCBmJ0>  
<https://www.youtube.com/watch?v=LCpXDEsfJh8>  
<https://www.youtube.com/watch?v=YjWqz1MobIA>  
<https://www.youtube.com/watch?v=slwGp0k7hHk>  
<https://www.youtube.com/watch?v=XVbyWXcT7ZE>  
<https://www.youtube.com/watch?v=dQEawc2LD2w>  
[https://www.youtube.com/watch?v=4a\\_NtSG3mh0](https://www.youtube.com/watch?v=4a_NtSG3mh0)  
<https://www.youtube.com/watch?v=6kViqzHvv7g>

<https://www.youtube.com/watch?v=qmFNH4DpwQ8>  
<https://www.youtube.com/watch?v=svF63NOtzkQ>  
<https://www.youtube.com/watch?v=OhBrJDoacco>  
[https://www.youtube.com/watch?v=C0tIJ1cvy\\_U](https://www.youtube.com/watch?v=C0tIJ1cvy_U)  
<https://www.youtube.com/watch?v=VTA5RAikDio>  
<https://www.youtube.com/watch?v=KRzET-uV3g>  
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<https://www.youtube.com/watch?v=wNkmSkwDYD4>  
<https://www.youtube.com/watch?v=SakHFpPeWxM>  
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<https://www.youtube.com/watch?v=yn2Hh8Y5pwA>  
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<https://www.youtube.com/watch?v=3oh3mjiwsyw>  
<https://www.youtube.com/watch?v=iwjKemPwyTc>  
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<https://www.youtube.com/watch?v=Ykw0gtddb0>

[https://www.youtube.com/watch?v=mxfgBQj\\_YTk](https://www.youtube.com/watch?v=mxfgBQj_YTk)  
<https://www.youtube.com/watch?v=24xihQPX64E>  
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<https://www.youtube.com/watch?v=it8lintLxYA>  
<https://www.youtube.com/watch?v=w6du-JNGrC4>  
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<https://www.youtube.com/watch?v=AWaiVNlYUk>  
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<https://www.youtube.com/watch?v=FAz3JpqiGNo>  
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<https://www.youtube.com/watch?v=2uYuSx-rGGk>  
<https://www.youtube.com/watch?v=dqXFtbdpB7A>  
<https://www.youtube.com/watch?v=S9JhoiKhvY0>  
<https://www.youtube.com/watch?v=PzgiVM8RGEI>  
<https://www.youtube.com/watch?v=gxVAJDGkE7E>  
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<https://www.youtube.com/watch?v=Tg-ExzvCzw>  
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<https://www.youtube.com/watch?v=l21sdCMzyUc>  
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<https://www.youtube.com/watch?v=PPlsp3a5GIQ>  
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<https://www.youtube.com/watch?v=9ISsUillR6Y>  
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<https://www.youtube.com/watch?v=zn4QGOYgmtY>

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<https://www.youtube.com/watch?v=2T3HT5YQj-g>  
<https://www.youtube.com/watch?v=Rgab6gtLfKl>  
<https://www.youtube.com/watch?v=XjODsDxqfNY>  
<https://www.youtube.com/watch?v=OS28IKd5bKl>  
<https://www.youtube.com/watch?v=zqWRC0wxpnw>  
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<https://www.youtube.com/watch?v=OV4JKxtJRSQ>  
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<https://www.youtube.com/watch?v=THm0mgN7mM0>  
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<https://www.youtube.com/watch?v=s9LdvzDrBZ8>  
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<https://www.youtube.com/watch?v=A7L8ljygxw>  
<https://www.youtube.com/watch?v=GgM-n169rpc>  
<https://www.youtube.com/watch?v=7iCYBU0YQ1U>  
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<https://www.youtube.com/watch?v=1DfjUZyAwM4>  
<https://www.youtube.com/watch?v=8MbYLeL32MY>  
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<https://www.youtube.com/watch?v=BdHZKHZBcho>  
<https://www.youtube.com/watch?v=iHd5TRH2zDA>  
<https://www.youtube.com/watch?v=6mGqr1cwlU>  
<https://www.youtube.com/watch?v=W3mmnrKymGw>  
<https://www.youtube.com/watch?v=vtpZXUjPVyc>  
<https://www.youtube.com/watch?v=9Pv0TpTUA20>  
[https://www.youtube.com/watch?v=S3Ji6vJD\\_gY](https://www.youtube.com/watch?v=S3Ji6vJD_gY)  
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<https://www.youtube.com/watch?v=ah29vV1GyII>  
<https://www.youtube.com/watch?v=Eatc8FitlzQ>  
<https://www.youtube.com/watch?v=BBL9T9dHy5g>  
<https://www.youtube.com/watch?v=s4Y40HdnRX4>  
<https://www.youtube.com/watch?v=-9uEmLNloMw>  
<https://www.youtube.com/watch?v=v036a6aVZj0>  
<https://www.youtube.com/watch?v=p1a5j2F3eV4>  
[https://www.youtube.com/watch?v=W\\_h9Wm7JMKs](https://www.youtube.com/watch?v=W_h9Wm7JMKs)  
<https://www.youtube.com/watch?v=y2anTf3DzMQ>  
<https://www.youtube.com/watch?v=4OK4C3vwdWM>

<https://www.youtube.com/watch?v=cQCf2Fl3mzg>  
[https://www.youtube.com/watch?v=r624\\_T2pUOI](https://www.youtube.com/watch?v=r624_T2pUOI)  
<https://www.youtube.com/watch?v=ro5lmxS4maM>  
<https://www.youtube.com/watch?v=bOWqkNhy9RU>  
<https://www.youtube.com/watch?v=1KHqTulcu8k>  
<https://www.youtube.com/watch?v=iy55pA7nRLg>  
<https://www.youtube.com/watch?v=BF7w6U3knpQ>  
<https://www.youtube.com/watch?v=xY4Zti2nIMs>  
[https://www.youtube.com/watch?v=ebRemcHM\\_To](https://www.youtube.com/watch?v=ebRemcHM_To)

**From:** Taylor Major <tmajor@urban1.com>  
**Sent:** Tuesday, May 09, 2017 12:38 PM  
**To:** YouTube (copyright@youtube.com)  
**Subject:** Copyright Complaint  
**Attachments:** YouTube Takedown Request - Coobtrax Infringing Links 3.docx

Hello,

I am writing to submit a copyright complaint against an account that has used audio from The Rickey Smiley Morning Show, a nationally syndicated radio morning show. The content is owned by Reach Media, Inc., a subsidiary of Radio One, Inc., and the account holder did not obtain permission from either entity to use content from the show. The links to the infringing videos are in the attached document.

Account Holder: Coobtrax

Contact information: [tmajor@radio-one.com](mailto:tmajor@radio-one.com)

I agree to the following statements:

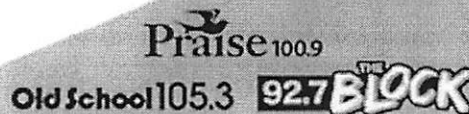
1. "I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law."
2. "The information in this notification is accurate, and under penalty of perjury, I am the owner, or an agent authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed."

Thank you,

Taylor Major

**Taylor Major**

Senior Law Clerk  
O: 704.968.0352  
8809 Lenox Pointe Drive, Suite A, Charlotte, NC 28273





The videos in the following links impermissibly use audio from the Rickey Smiley Morning Show, a nationally syndicated morning show, the rights of which belong to Reach Media, Inc.:

<https://www.youtube.com/watch?v=vqhMt3gRdw>  
<https://www.youtube.com/watch?v=UNldFdnWN8I>  
<https://www.youtube.com/watch?v=oYyX6mtUEyo>  
<https://www.youtube.com/watch?v=5WQ5KYnpss>  
<https://www.youtube.com/watch?v=OIIXVCLsxU>  
<https://www.youtube.com/watch?v=DfnnxNfzGls>  
<https://www.youtube.com/watch?v=vbWx-zYYN2E>  
<https://www.youtube.com/watch?v=DTkcdx6YrUE>  
<https://www.youtube.com/watch?v=TgDuw52J0pA>  
<https://www.youtube.com/watch?v=sziu-ALOisg>  
<https://www.youtube.com/watch?v=Ezf8WQETnfe>  
[https://www.youtube.com/watch?v=CgBQI9V1A\\_I](https://www.youtube.com/watch?v=CgBQI9V1A_I)  
<https://www.youtube.com/watch?v=OniLYgQ26c8>  
[https://www.youtube.com/watch?v=Z\\_evUqLpEd4](https://www.youtube.com/watch?v=Z_evUqLpEd4)  
<https://www.youtube.com/watch?v=WrdwHzKmRSI>  
<https://www.youtube.com/watch?v=FX4Ny6IMru0>  
<https://www.youtube.com/watch?v=6fcxlyEa6lg>  
<https://www.youtube.com/watch?v=-Wd98AYW-uc>  
[https://www.youtube.com/watch?v=0toAc\\_gFlwU](https://www.youtube.com/watch?v=0toAc_gFlwU)  
<https://www.youtube.com/watch?v=x9ijxZLkKzk>  
<https://www.youtube.com/watch?v=Mex6owSCihE>  
<https://www.youtube.com/watch?v=apXZnWrvsJw>  
<https://www.youtube.com/watch?v=-zG59A3kDuc>  
<https://www.youtube.com/watch?v=3XbBOqG0CEU>  
<https://www.youtube.com/watch?v=cJtxAiqShxc>  
<https://www.youtube.com/watch?v=Kv-mXlrkeA>  
<https://www.youtube.com/watch?v=UzgSj9aNZ28>  
<https://www.youtube.com/watch?v=MM2akj3iboY>  
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<https://www.youtube.com/watch?v=vVZoXutmaMM>  
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<https://www.youtube.com/watch?v=-56uG752NH0>  
<https://www.youtube.com/watch?v=e2Dr4CFyqaE>  
<https://www.youtube.com/watch?v=An91aCHaJrk>  
<https://www.youtube.com/watch?v=cRIgtrfZ3o>  
<https://www.youtube.com/watch?v=50LAKLEj-AE>  
<https://www.youtube.com/watch?v=jdAiUMh4IOg>  
[https://www.youtube.com/watch?v=jl\\_ovKeAU-g](https://www.youtube.com/watch?v=jl_ovKeAU-g)  
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<https://www.youtube.com/watch?v=FgMAMJDTd5M>  
<https://www.youtube.com/watch?v=UQSXRpbYxmo>  
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[https://www.youtube.com/watch?v=dpp\\_9nv8Bxk](https://www.youtube.com/watch?v=dpp_9nv8Bxk)  
<https://www.youtube.com/watch?v=INGksHIT9Fo>

<https://www.youtube.com/watch?v=V4Wv0lyRHSc>  
<https://www.youtube.com/watch?v=FN2IYAQF55M>  
<https://www.youtube.com/watch?v=thV20iRRokg>  
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AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

## UNITED STATES DISTRICT COURT

for the

Northern District of California

In re DMCA Subpoena to Youtube, LLC

Plaintiff

v.

Defendant

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

YouTube, LLC  
1000 Enterprise Way, Sunnyvale, CA 94089

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All identifying information for the YouTube user "Coobtrax", from any and all sources, including but not limited to all records that prove the name(s), address(es), telephone number(s), email address(es), IP addresses, bank or other account number(s) and/or payment information of its operator(s).

Place: GORDON & REES LLP  
275 BATTERY STREET, SUITE 2000  
SAN FRANCISCO, CA 94111

Date and Time:

09/01/2017 10:00 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) URBAN ONE, INC., who issues or requests this subpoena, are:

Yuo-Fong Amato, Gordon & Rees LLP, 275 BATTERY STREET, SUITE 2000, bamato@grsm.com, (619) 204-3746

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
  - (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
  - (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**DECLARATION OF YUO-FONG AMATO IN SUPPORT OF URBAN ONE, LLC'S  
REQUEST FOR ISSUANCE OF SUBPOENA PURSUANT TO 17 U.S.C. § 512(h) TO  
IDENTIFY ALLEGED INFRINGER(S)**

I, Yuo-Fong Amato, declare as follows:

The purpose for which this subpoena is sought is to obtain the identity of alleged infringer(s) and such information will only be used for the purpose of protecting rights under 17 U.S.C. §101 *et seq.*

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed this 7th day of August 2017 at Philadelphia, Pennsylvania.

  
\_\_\_\_\_  
YUO-FONG AMATO